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July 17, 2018

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VIA ECF

Application granted. Conference adjourned to October 19, 2018 at 2:30 p.m.
Time waived in the interest of justice.

Hon. William H. Pauley III
United States District Court
500 Pearl Street
New York, NY 10037-1312

SO ORDERED:



WILLIAM H. PAULEY III

U.S.D.J.

Re: United States v. Sunita Kumar
Docket No.: 17-cr-703 (WHP)

July 17, 2018


Dear Hon. Pauley:

Counsel for the defendant, Sunita Kumar, writes, with the consent of the Government, AUSA Christopher J. DiMase, to respectfully request that the Court adjourn the next conference in this matter which is currently scheduled on Thursday, July 19, 2018 at 12:30 p.m. until either October 19, 2018 or October 26, 2018, or any time thereafter convenient to the Court. Counsel for the defendant is requesting this adjournment due to the voluminous nature of the discovery which has been produced by the Government.

To date, counsel has completed his initial review of all of the discovery and has retained the law office of Wilentz, Goldman & Spitzer, P.A. to aid in the analysis and financial ramifications of the government's allegation that over 220 individual medications were, in essence, shorted and not provided to the consumer resulting in the defendant illegally acquiring a gain of approximately \$9,000,000.00. The government's allegations focus upon discrepancies in billing found within two pharmacies. Counsel for defendant has completed his review of the first pharmacy and provided his findings to the government for its consideration. Counsel was recently advised from representatives of Wilentz, Goldman & Spitzer, P.A. that the analysis of the remaining pharmacy will require approximately 90 days to complete. It is counsel's firm belief that the discovery process will be completed within the next ensuing 90 days and the government will be provided a copy of counsel's findings.

Via this application, defense counsel also requests to exclude from the Speedy Trial Act's operation the time between July 19, 2018 through the date selected by the court in the interests of justice. See 18 U.S.C. §3161(h)(7)(A).

Respectfully Submitted,



Lawrence V. Carra
LVC:ag